

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST 976.09
"THE 1999 HAZARDOUS WASTE REPORT"**

October 15, 1998

Draft - Do Not Cite or Quote

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

This ICR is entitled "The 1999 Hazardous Waste Report," number 976.09.

1(b) Characterization of the Information Collection

This ICR is a renewal of an on-going information collection request to support the reporting by hazardous waste generators and treatment, storage, or disposal facilities (TSDFs) required by the Resource Conservation and Recovery Act of 1976 (RCRA). RCRA Sections 3002 and 3004, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), requires reporting to EPA or to authorized States at least every two years. The 1999 Hazardous Waste Report (also called the Biennial Report), or comparable State report, is the report form used by generators and TSDFs to satisfy this requirement.

Hazardous waste generators and TSDFs must report information on the quantities, type, and management method of generated hazardous wastes and hazardous wastes received from off site. The data collected are used by the Office of Solid Waste to prepare a national report that is made available to Congress and the public, summarizing hazardous waste generation and management activities. The data also are used by EPA and the States for programmatic and regulatory needs.

Data are collected from respondents on Form 8700-13 A/B, or comparable State forms, either on paper or in electronic media and entered into an electronic database by State and Regional environmental authorities. EPA compiles the State and Regional databases into a national database, entitled the Biennial Report System (BRS), on the mainframe computer at EPA's National Computing Center.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

RCRA requires EPA to establish standards applicable to generators and TSDFs as may be necessary to protect human health and the environment. Specifically included are provisions requiring the submission of reports at least once every two years. See the following section on legal authority for more detail.

There are a number of Federal and State uses of Biennial Report information. EPA uses Biennial Report information for planning and developing regulations. Regulation development and compliance depend on descriptions and quantities of generated hazardous waste and management methods used by TSDFs. Also, Biennial Report information allows the Agency to ascertain whether its regulations are having the desired effect on the generation and management of hazardous waste. For example, Biennial Reports provide information on whether wastes have shifted from one method of disposal to another. Some State uses of Biennial Report data include support of planning, fee assessment, compliance monitoring, and enforcement.

Legal Authority for the Information Collection

RCRA Sections 3002 and 3004 authorize the biennial hazardous waste report. Both sections require EPA to establish and promulgate standards regarding record keeping and reporting for Subtitle C hazardous wastes. Specifically, Section 3002 applies to hazardous waste generators and Section 3004 applies to hazardous waste treatment, storage, and disposal facilities.

HSWA changed Section 3002 of RCRA and added specific biennial hazardous waste reporting requirements. The new language also established the waste minimization requirements, effective September 1985. The HSWA amendments required generators and facilities to report the following information to the Administrator at least once every two years:

- Quantities and nature of hazardous waste generated during the year;
- Disposition of the hazardous waste generated;
- The efforts undertaken to reduce volume and toxicity of waste generated; and
- Changes in volume and toxicity of waste actually achieved during the year in question, in comparison with previous years (provided that information is available).

The pertinent text of Sections 3002 and 3004 as amended by HSWA follows:

Section 3002(a)(6) - submission of reports to the Administrator (or the State agency in any case in which such agency carries out a permit program pursuant to this subtitle) at least every two years, setting out -

(A) the quantities and nature of hazardous waste identified or listed under this subtitle that have been generated during the year;

(B) the disposition of all hazardous waste reported under subparagraph (A);

(C) the efforts undertaken during the year to reduce the volume and toxicity of waste generated; and

(D) the changes in volume and toxicity of waste actually achieved during the year in question in comparison with previous years, to the extent such information is available for years prior to enactment of the Hazardous and Solid Waste Amendments of 1984.

Section 3004(a) - In General - Not later than eighteen months ... the Administrator shall promulgate regulations establishing such performance standards, applicable to owners and operators of facilities for the treatment, storage, or disposal of hazardous waste identified or listed under this subtitle, as may be necessary to protect human health and the environment. ... Such standards shall include, but need not be limited to, requirements respecting -

(1) maintaining records of all hazardous wastes identified or listed under this title which are treated, stored or disposed of, as the case may be, and the manner in which such wastes were treated, stored, or disposed of;

(2) satisfactory reporting, monitoring, and inspection and compliance with the manifest system referred to in section 3002(5);

In addition, Section 3004 (h)(2) of the Resource Conservation and Recovery Act establishes conditions for the implementation of restrictions on the land disposal of hazardous waste. It provides for the Administrator to establish an effective date different from the effective date which would otherwise apply, based on the earliest date on which adequate alternative treatment, recovery, or disposal capacity which protects human health and the environment will be available. Information from the biennial hazardous waste report is also used to make capacity availability determinations required under this provision.

2(b) Use and Users of the Data

As indicated in Section 2(a) above, there are a number of different Federal and State uses for the data collected in the biennial hazardous waste report. One major category of important category of information used is basic waste information. Basic waste information is essential for the management of the RCRA program. It is used to inform many aspects of program operations at the Headquarters, Regional Office, and State levels. The primary Agency users are in the Office of Solid Waste, specifically the Hazardous Waste Minimization and Management Division, the Hazardous Waste Identification Division, the Permits and State Programs Division, the Communications, Information and Resources Management Division, and Office of Enforcement and Compliance Assurance. Functions supported include generator inspection, regulatory review and modification, fiscal resource allocation, and reporting to the Congress and the public. Basic waste information includes the following:

- Identification information: EPA ID; company name; location address; and mailing address.
- Technical contact and certification information: generator status; on-site management status; technical contact name and telephone number; and certification of truth and completeness.
- Basic characterization and management information for each waste:
 - narrative waste description;
 - hazardous waste codes;
 - physical/chemical form of the waste;
 - origin/source of the waste;
 - quantity generated in reporting year;
 - point of measurement;
 - on-site system type and quantity managed;
 - system type for waste shipped off site; and
 - waste codes and system type for wastes received.

Another important category of information that Biennial Report data supply is on the population of hazardous waste generators and TSDFs and their status. Various data elements useful for defining the populations include: generator status in the reporting year; reasons for not generating; on-site storage status; and on-site waste management status.

The Biennial Report provides valuable information to States for tracking intra- and interstate shipments of waste. Most States do not collect or track manifests, which provide some information on off-site shipments of hazardous waste; therefore, the Biennial Report serves as the only source of this information. Data elements for this category of information include: (1) for waste shipped off site, the EPA ID of the off-site facility to which waste is shipped, the corresponding system type, and the quantity shipped; and (2) for wastes received from off site, the EPA ID of generator, the system type, and the quantity received.

Copies of the Report forms and instructions are included as Appendix A of this document.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

EPA has determined that no other federal agency, department or source outside the federal government has current national information on the generation or management of RCRA hazardous waste. The biennial hazardous waste report is the only data collection vehicle available to obtain such information on a regular basis.

3(b) Public Notice

In compliance with the 1995 PRA, EPA will solicit public comments on this ICR through an announcement in the *Federal Register* on October 13, 1998 (63 *FR* 54691). The public comment period will extend through December 14, 1998. EPA will review and take into account comments received from the public.

3(c) Consultations

EPA will seek public comment on this ICR (see Section 3(b)). In addition, EPA consulted with one trade association and four potentially affected industries to obtain input on the burden associated with each Biennial Report form. The consultations were conducted with:

Company Name	Contact	Telephone No.
Safety Kleen (Lexington Plant)	John Cain	(803) 356-8509
Advanced Flex, Inc.	Brad Hoium	(612) 930-4828
Eli Lilly and Company	Ron Pitzer	(317) 276-6196
Miniature Circuits	Dave Gooley	(612) 549-5640
American Electroplaters and Surface Finishers Society, National Association of Metal Finishers, and Metal Finishing Suppliers Association	Al Collins	(202) 965-5190

These contacts provided updated estimates of the hourly burden per form, assuming both manual and electronic preparation (see Section 6(a)). During the consultations, respondents were also asked to comment on the accuracy of the respondent wage rates.

3(d) Effects of Less Frequent Collection

The two-year cycle is the minimum statutorily acceptable collection period. Though some States administering the RCRA program find it useful to collect hazardous waste report information on an annual or quarterly basis, EPA does not require more frequent data collection.

3(e) General Guidelines

This ICR follows OMB's general guidelines for information collections.

3(f) Confidentiality

The 1999 Hazardous Waste Report requires establishments to provide information on various aspects of hazardous waste generation and management. Some businesses consider some of their hazardous waste information to be Confidential Business Information (CBI). A business may, if it desires, protect its biennial hazardous waste report information from public disclosure by asserting a claim of confidentiality covering all or part of the information in the report it furnishes to EPA. When such a claim is asserted, EPA must and will treat the information in accordance with the confidentiality regulations set forth in 40 CFR Part 2, Subpart B. EPA also ensures that the information collection procedures comply with the Privacy Act of 1974 and the OMB Circular 108.

3(g) Sensitive Questions

There are no sensitive questions asked in the 1999 Hazardous Waste Report.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and SIC Codes

Based on 1995 Biennial Report data, the SIC codes that represent the respondents are as follows:

SIC Code Description	SIC Code	Percent of Generators	Percent of TSDFs
Chemicals and Allied Products	28	12	25
Primary Metal Industries	33	4	5
Fabricated Metals	34	12	6
Electrical Equipment	36	7	5
Transportation Equipment	37	6	5
Instruments and Related Products	38	2	1
Other Manufacturing	20-39	19	13
Electric, Gas, and Sanitary Services	49	4	8
Other Transportation and Utilities	40-48	4	4
Wholesale Trade	50-51	3	6
Services	70-89	5	11
National Security and International Affairs	97	2	6
Remaining SIC Groups		20	5

Although respondents are no longer asked to submit facility-wide SIC codes in the Biennial Report, the information can be derived from the waste stream-specific SIC codes.

4(b) Information Requested

Read the Instructions

The 1999 Hazardous Waste Report package consists of three Federal forms and one State-optional form, and the accompanying instructions. All large generators and TSDFs are expected to review the forms and read the pertinent parts of the instructions.

(i) Data item

Read the 1999 Hazardous Waste Report instructions.

(ii) Respondent Activity

Read the instructions.

Preparing and Submitting Forms

As mentioned before, the report consists of four forms: Identification and Certification (Form IC), Waste Generation and Management (Form GM), Waste Received From Off-Site (Form WR), and Off-Site Identification (Form OI). The following is a description of each form and who must prepare and submit them:

Form IC - Identification and Certification. Form IC must be submitted by anyone that:

- Meets the definition of a RCRA large quantity generator during 1999; and/or
- Treats, stores, or disposes of RCRA hazardous wastes on site during 1999.

Form IC identifies the respondent and establishes its status as a hazardous waste generator or TSDf. This form also contains a space for certifying the accuracy of the information submitted in the report.

Form GM - Waste Generation and Management. Form GM must be submitted by all respondents that generated or shipped RCRA hazardous waste during 1999. This form collects information on each generated or shipped waste including its description, characterization, quantity, and disposition.

Form WR - Waste Received From Off-Site. Form WR must be submitted by all sites that received RCRA hazardous waste from off site during 1999. This form collects information on each waste received from off site including a description of the waste, a brief characterization, the EPA ID number of the generator, the quantity of waste received, and the method of waste management.

Form OI - Off-Site Identification. Form OI is not required; rather, it is provided as an option for States to collect the names and addresses of those handlers that transport waste from, ship waste to, or receive waste from their respondents.

After completing the relevant forms, facilities must submit the information to the State or EPA Region and maintain a copy of each completed form for three years.

(i) Data Items

- Gather information to complete the report forms from hazardous waste manifests and waste accumulation logs;
- Complete the forms;
- File the completed form with the State or the Regional EPA office listed in the instruction booklet; and
- Maintain a copy of each form for a period of three years.

(ii) Respondent Activities

- Prepare Form IC;
- Prepare Form GM;
- Prepare Form WR;
- Prepare Form OI;
- Submit the report; and
- Maintain a copy of each form for three years.

5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

As with most of the RCRA program, the Biennial Report data collection process is delegated to the States through the EPA Regions. Briefly, the process is as follows.

States mail either their own or, in most cases, the Federal forms to potential respondents, collect the responses, follow-up with non-respondents, enter the data into a database (usually BRS), assure data quality, and forward the data to the EPA Regions. The Regions monitor State implementation activities, review the data submitted by the States, work with the States to resolve any data problems, and then forward the data to EPA Headquarters. EPA Headquarters monitors State and Regional Activities, reviews the data submitted by the Regions, and works with the Regions to resolve any data problems. It also develops overall implementation plans and provides the forms and software necessary to process them.

In practice, this distribution of activities does not always follow this path. In some cases, the Region performs all of the State roles. In others, the Region provides direct processing support for some, but not all, of the collection activities. In still other cases, the Regions provide additional resources to the States beyond the core grant.

Specifically, Agency activities for the 1999 Hazardous Waste Report include the following:

- Develop 1999 Report forms and instructions. The forms and instructions are the same as those used in 1997.
- Distribute and collect Report forms and instructions. EPA Headquarters provides and distributes the form and instruction booklets to the States and Regions. States (or Regions) prepare mailing lists, mail forms and instructions, record receipt of completed forms, and contact sites that fail to respond within the specified time period.
- Develop national database software. EPA will develop the national BRS load software, database, QA reports, and on-line reports.
- Assist respondents. States, Regions, and Headquarters provide assistance to respondents. EPA operates a national toll-free telephone help line to answer respondent questions.
- Enter report submissions. States or Regions, and the regulated entities, key enter or electronically load the data into a database. BRS software for the data entry is being privatized for the 1999 Biennial Report cycle. States, Regions, and the regulated community will use one of the private vendor's software for data entry.
- Quality assurance. States, Regions, and Headquarters all perform data quality assurance. This includes follow-up to non-respondents, the detection and correction of unacceptable responses, and the verification of exceptional responses and significant response changes between report years. BRS supports these activities with a variety of functions.

- Prepare the National Report and other analyses. The national BRS software generates a variety of State and national reports. EPA will also prepare a consolidated *1999 National Biennial RCRA Hazardous Waste Report* that will be made available to the Congress and the public.
- Store the data. The 1999 Hazardous Waste Reports (paper copies) will be stored by the States for a period of three years and an electronic database will be maintained by each State or Region.

5(b) Collection Methodology and Management

To ensure that the Biennial Report data collected are accurate, complete, and retrievable, EPA has employed a variety of forms design, automatic data processing, and process management techniques.

Forms Design. To insure that respondents can, without undue burden, accurately complete the forms, EPA has provided for exception reporting, not required any special testing, and provided a toll-free telephone help line.

As in previous years, the 1999 Report forms are designed differently for different types of information to allow respondents to address only the questions relevant to their operations. Few sites are required to file all of the Report forms. All respondents are required to file the Form IC. Typically, all respondents filing an IC form also file GM Forms; however, only a portion (close to 10 percent) of all respondents will file Form WR.

EPA again plans to operate a toll-free telephone help line that will be available to all respondents with questions about the EPA 1999 Hazardous Waste Report. The help line will also provide assistance to sites that wish to file their EPA 1999 Hazardous Waste Report on magnetic media.

Automatic Data Processing. The Biennial Report data collection effort is delegated and decentralized. Central to this process is the national Biennial Reporting System (BRS) and related procedures developed by EPA to support:

- Acceptance of the data into a standard electronic format;
- Quality assurance of the data;
- Storage of national data; and
- Use of the data.

To support the conversion of submitted 1999 Reports into a standard electronic format, EPA developed electronic reporting standards, the documentation necessary for reporters to produce submissions to those electronic reporting standards, and the software necessary to load electronic submissions. The standards are simple ASCII files.

To support the dual quality assurance objectives of completeness and accuracy, EPA included several functions in the BRS. To ensure completeness, the BRS allows users to import data from outside sources as long as it is in a standard, prescribed format. To ensure accuracy of the submission, national BRS software provides several main features. The national BRS software will check for valid responses and will generate detailed reports. Unusual, odd, or inconsistent responses are flagged and described by a set of report programs. The responses examined are selectable to focus activities and limit burden. Another program generates exception reports that identify outliers on data that are considered the most important. The reports generated prioritize the exceptions and highlight the data in question. Finally, programs generate comparison reports that identify large quantity changes in responses between report years. Again, the reports prioritize the changes and highlight the data in question.

To ensure that data in State and Regional databases reach the intended destination (the Regional and National databases), BRS provides a set of automatic audit controls, where practicable, and reconciliation reports.

To ensure that the data is retrievable, BRS is managed in an Oracle database platform. Oracle is a network computing database platform that manages large amounts of information securely, reliably, and economically over computer networks. Oracle is designed to lower computing costs, manage all types of data, and deliver faster information access to all kinds of users.

Process Management. To ensure that the necessary implementation activities occur, EPA has defined the data collection process, assigned responsibilities, and established a schedule for the implementation of the process. Two key milestones of the Biennial Report schedule are explicitly tracked in the RIP. Therefore, senior level EPA management in the Regions and Headquarters are attentive to implementation progress.

Also, EPA provides training and documentation for State and Regional personnel on the overall process and on the use of BRS and the necessary procedures.

Finally, EPA holds regular conference calls to discuss progress and difficulties. Periodic status reports are sent to EPA and State management which succinctly and graphically reveal progress toward or failure to meet milestones.

5(c) Small Entity Flexibility

In implementing RCRA, EPA uses the quantity of waste generated to determine whether a firm is a small business. EPA categorizes generators of less than 1,000 kilograms of non-acute hazardous waste per month to be small quantity generator (SQGs) and considers them small businesses.

These SQGs are exempt from the RCRA Subtitle C reporting requirements and are not required to file the 1999 Hazardous Waste Report. A SQG who sent the 1999 Hazardous Waste Report due to a recent change in status or error need not respond. However, EPA has included a convenient return postcard in the 1999 Report package to be used to insure they are not the subject of follow-up contacts or enforcement actions.

EPA recognizes that some smaller businesses are not considered SQGs on the basis of the quantity of hazardous waste that they generate. These smaller businesses are required to file the Report and may not have the same technical and administrative resources as larger business. EPA has, however, taken several steps to reduce the burden on these smaller businesses:

- EPA will establish a toll-free telephone help line staffed by technical personnel to assist in filling out the 1999 Report;
- Smaller businesses that only generate hazardous waste and ship it off site for management will be required to file only two of the Report forms; and
- Smaller generators and waste management firms typically have few hazardous wastes or on-site management processes. Consequently, they will require less time to fill out the 1999 Report.

5(d) Collection Schedule

EPA's 1999 biennial hazardous waste reporting implementation schedule is outlined below.

Reporting and Implementation Schedule

Activity	Lead (HQ, Region, or State)	Start Date	End Date
Submit '99 Forms to OMB	HQ	December 1998	December 1998
Print '99 Forms	HQ	August 1999	September 1999
Distribute '99 Forms to States	HQ		October 1999
Distribute '99 Forms to Handlers	States		December 1999
BRS Help Line	HQ	January 2000	June 2000
Handler '99 Forms Due	States		March 1, 2000
Key Data and QA/QC data	States	March 2000	June 2000
State Data due to Region	States		July 1, 2000
QA/QC State data; Follow-up/ Reconcile DBs	Regions/ States	July 2000	September 2000
Regional Data due to HQ	Region		September 30, 2000
Finalize NODB; QA/QC Regional Data/ Follow-up/Reconcile DBs	HQ/ Regions/ States	September 2000	December 2000
Begin development of Draft '99 National Biennial RCRA Hazardous Waste Report	HQ	November 2000	February 2001

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

EPA estimates the respondent burden hours associated with all of the information collection requirements covered in this ICR in Exhibit 1. The exhibit lists all of the respondent activities associated with the 1999 Biennial Report and presents burden and cost estimates for each. The burden estimates are broken down by labor category (legal, managerial, technical, and clerical) and totaled on a per activity basis. These burden estimates are then multiplied by the estimated number of respondents and the estimated number of activities per respondent to obtain an estimate of the overall burden to the regulated universe for each activity.

Source of Burden Estimates

The burden estimates for each activity are based on the estimates contained in the previous version of this ICR and have been validated through informal consultations held with members of the regulated community (see Section 3(c)).¹

Methodology for Accounting for Electronic Reporting

In developing the previous version of this ICR, EPA held consultations with a few of the facilities that submitted very high numbers of GM forms and/or WR forms (based on 1993 BRS data) to discuss their use of electronic reporting and its effect on their burden for submitting the Biennial Report. Based on these conversations, facilities indicated that GM and WR forms often can be prepared from databases that track manifests or other information for billing purposes. Based on these consultations, EPA estimated the hourly burden for the GM and WR forms submitted electronically to be significantly less than for forms submitted on paper. Because these databases (e.g., manifest tracking systems) seem to be prevalent only for commercial facilities, EPA used 1993 BRS data to identify the approximate proportion of facilities that are commercial, and then identified the proportion of GM forms and WR forms that these facilities submitted. According to 1993 BRS data, commercial facilities accounted for 58 percent of the GM forms submitted and 97 percent of WR forms. To calculate the burden per labor category for these forms, EPA multiplied the proportion commercial by the burden for electronic reporting and added the proportion non-commercial multiplied by the burden hours for respondents that submit the paper forms.

In developing the current version of this ICR, EPA consulted with several of the same facilities (see Section 3(c)) to confirm that the respondent burden estimates (developed in the previous version of this ICR) continue to reflect the time spent by respondents in filling out these forms (both manually and electronically). These facilities generally agreed that no significant changes had occurred in their methods of preparing Biennial Report forms and that the respondent burden estimates are accurate.

¹EPA believes that, since the requirements of the 1999 Biennial Report are no different from those of the 1997 Biennial Report, the burden hour estimates developed for the 1997 Biennial Report (in the previous version of this ICR) represent a good approximation of the burden associated with the 1999 Biennial Report.

6(b) Estimating Respondent Costs

(i) *Estimating Labor Costs*

EPA estimates an average hourly respondent labor cost (including overhead) of \$91.24 for legal staff, \$69.40 for managerial staff, \$45.43 for technical staff, and \$23.76 for clerical staff. To arrive at these estimates, EPA consulted Bureau of Labor Statistics' Employment Cost Index and updated these costs to current dollars using a three percent rate of inflation. Using the total burden hours discussed in Section 6(a) and the wage rates outlined in this section, Exhibit 1 illustrates the labor costs associated with all of the information collection requirements covered in this ICR.

(ii) *Estimating Capital and O&M Costs*

To submit the report, EPA estimates that facilities will incur a one-time postage cost of \$1.50 each year for the two-year period of the ICR. This estimate is based on the mailing cost of \$2.99 for a certified mail package.

EPA estimates that facilities will incur annual operation and maintenance (O&M) capital costs associated with maintaining a copy of each form for three years. For respondents that submit paper versions of the forms, EPA estimates that to maintain files, facilities will purchase file cabinets and make photocopies. For respondents that submit the information electronically, EPA estimates that to maintain files, facilities will purchase disk storage space (e.g., floppy disks). EPA estimates that file storage, whether paper or electronic, will cost \$0.01 per form and that photocopying charges will cost \$0.10 per form submitted for the two-year period of the ICR. As with burden hours, the costs for electronic reporting are incorporated into the costs estimates for the GM and WR forms by multiplying the proportion commercial by the O&M cost for electronic reporting (\$0.01) plus the proportion non-commercial multiplied by the O&M costs for respondents that submit the paper forms (\$0.01+\$0.10).

6(c) Estimating Agency Burden and Cost

EPA estimates annual Agency burden hours and costs associated with all of the requirements covered in this ICR in Exhibit 2. EPA believes that the Headquarters, Regional, and State offices will be involved in these activities. These burdens assume that all States use the Federal 1999 Biennial Report forms and BRS software. Based on the 1998 GS pay schedule, EPA estimates an average hourly labor cost of \$66.66 for legal staff (GS-15, Step 5), \$58.81 for managerial staff (GS-15, Step 1), \$42.31 for technical staff (GS-13, Step 1), and \$18.05 for clerical staff (GS-6, Step 1). To derive these hourly estimates, EPA divided the annual compensation estimates by 2,080, which is the number of hours in the Federal work-year, and then multiplied the hourly rates by the standard government overhead factor of 1.6.

As shown in Exhibit 2, depending on the type of Agency activity, some of the total burden per Agency activity is based on the number of respondents or the number of forms. Burden hours for entering report submissions for each labor category account for electronic reporting; burden for key entry is multiplied by the proportion of total forms submitted on paper and added to the burden for electronically loading the data (estimated to be one-tenth the burden for key entry) multiplied by the proportion of forms expected to be submitted electronically (see Section 6(a)).

EXHIBIT 1
THE 1999 HAZARDOUS WASTE REPORT
ESTIMATED ANNUAL RESPONDENT BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent								Total Hours and Costs		
	Leg.	Mgr.	Tech.	Cler.	Respon.	Labor	Capital/	O&M	Number of	Total	Total
	\$91.24/ Hour	\$69.40/ Hour	\$45.43/ Hour	\$23.76/ Hour	Hours/ Activity	Cost/ Activity	Startup Cost	Cost	Respon. Activities	Hours/ Year	Cost/ Year
Read the instructions											
Read the 1999 Hazardous Waste Report instructions	0.00	1.00	1.00	0.00	2.00	\$114.83	\$0.00	\$0.00	7,715	15,430	\$885,913
Preparing and Submitting Forms											
Prepare Form IC	0.00	0.24	0.88	0.25	1.37	\$62.57	\$0.00	\$0.00	7,715	10,570	\$482,728
Prepare Form GM	0.00	0.11	0.44	0.04	0.59	\$28.57	\$0.00	\$0.00	67,043	39,555	\$1,915,419
Prepare Form WR	0.00	0.00	0.11	0.05	0.16	\$6.19	\$0.00	\$0.00	393,616	62,979	\$2,436,483
Prepare Form OI	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	0	0	\$0
Submit the 1999 Hazardous Waste Report	0.00	0.00	0.00	0.10	0.10	\$2.38	\$1.50	\$0.00	7,715	772	\$29,934
Maintain a copy of each form for three years	0.00	0.00	0.01	0.04	0.05	\$1.40	\$0.00	\$0.02	468,374	23,419	\$665,091
TOTAL	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	Varies	152,725	\$6,415,568

EXHIBIT 2
THE 1999 HAZARDOUS WASTE REPORT
ESTIMATED ANNUAL AGENCY BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours and Costs Per Respondent								Total Hours and Costs		
	Leg. \$66.66/ Hour	Mgr. \$58.81/ Hour	Tech. \$42.31/ Hour	Cler. \$18.05/ Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O&M Cost	Number of Respon. Activities	Total Hours/ Year	Total Cost/ Year
Develop 1999 Report forms and instructions	0.00	120.00	600.00	3,000.00	3,720.00	\$86,593.20	\$0.00	\$0.00	1	3,720	\$86,593
Distribute and collect Report forms and instructions	0.00	0.05	0.39	0.43	0.87	\$27.20	\$0.00	\$0.00	15,430	13,424	\$419,696
Develop database software	0.00	6,510.00	33,800.00	4,000.00	44,310.00	\$1,885,131.10	\$0.00	\$0.00	1	44,310	\$1,885,131
Assist respondents	0.00	0.08	0.39	0.63	1.10	\$32.58	\$0.00	\$0.00	15,430	16,973	\$502,709
Key entry of report submissions	0.00	0.01	0.04	0.22	0.27	\$6.36	\$0.00	\$0.00	47,682	12,874	\$303,258
Quality assurance	0.00	0.03	0.18	0.17	0.38	\$12.27	\$0.00	\$0.00	468,374	177,982	\$5,746,949
Prepare the National Report and other Analyses	0.00	1,800.00	800.00	400.00	3,000.00	\$146,926.00	\$0.00	\$0.00	1	3,000	\$146,926
Store the data	0.00	0.0003	0.0015	0.009	0.01	\$0.24	\$0.00	\$0.00	468,374	4,684	\$112,410
TOTAL	Varies	Varies	Varies	Varies	Varies	Varies	\$0.00	\$0.00	Varies	276,967	\$9,203,672

6(d) Estimating the Respondent Universe and Total Burden and Cost

EPA estimates that the total number of respondents to the 1999 Hazardous Waste Report will be approximately 15,430, which annualized over the two-year report cycle equals 7,715 per year². The number of respondents and forms for each respondent activity is presented below. These estimates assume that all questions and forms are submitted, even those that are not currently required.

Read the 1999 Hazardous Waste Report Instructions

EPA estimates that all 15,430 respondents will read the instructions to the 1999 Hazardous Waste Report. Annualized over the two-year report cycle, this results in 7,715 facilities reading the instructions each year.

Prepare Form IC

EPA anticipates that each year 7,715 (15,430/2) respondents will each submit one IC form, for a total of 7,715 IC forms submitted to EPA.

Prepare Form GM

EPA anticipates that each year 7,715 (15,430/2) respondents will each submit an average of 8.69 GM forms, for a total of 67,043 GM forms submitted to EPA.³

Prepare Form WR

EPA expects that each year 584 (1168/2) respondents will each submit an average of 674 forms, for a total of 393,616 forms submitted to EPA.⁴ Note that the number of WR forms represents the number of blocks of WR form questions completed; the paper form actually contains three blocks of the same WR information (i.e., the same questions, repeated three times on the same page).

Prepare Form OI

Because this form is a State optional form, EPA does not expect any facilities to submit Form OI and therefore does not calculate the burden for this form.

Submit the Report to State/Region

EPA expects each respondent, 7,715 facilities per year, to submit the report to the appropriate State or Region.

²The number of respondents to the 1999 Hazardous Waste Report (15,430 facilities) was estimated using a trend analysis of 1993 and 1995 BRS data (extrapolated to 1999) assuming a constant rate of decline.

³The average number of 1999 GM forms submitted by each respondent (8.69 forms) was estimated using a trend analysis of 1993 and 1995 BRS data (extrapolated to 1999) assuming a constant rate of decline.

⁴The average number of 1999 WR forms submitted by each respondent (674 forms) was estimated using a trend analysis of 1993 and 1995 BRS data (extrapolated to 1999) assuming a constant rate of decline.

Maintain a Copy of Each Form

EPA expects facilities to retain an estimated 468,374 ($7,715 + 67,043 + 393,616 + 0$) forms each year.

6(e) Bottom Line Burden and Cost Tables

(i) *Respondent Tally*

Exhibit 3 presents the bottom line respondent burden and costs associated with the 1999 Biennial Report. EPA estimates that respondents will incur an annual burden of 152,725 hours and a cost of \$6,415,568. Exhibit 3 also presents cost estimates by type (labor, capital/startup, or O&M) as well as two-year totals for burden and costs (to reflect the overall burden and costs incurred by respondents over the two-year period covered by this ICR).

(ii) *Agency Tally*

Exhibit 4 presents the bottom line Agency burden and costs associated with the 1999 Biennial Report. EPA estimates an Agency burden of 458,175 hours and a cost of \$19,246,703. Exhibit 4 also presents cost estimates by type (labor, capital/startup, or O&M) as well as two-year totals for burden and costs (to reflect the overall burden and costs incurred by the Agency over the two-year period covered by this ICR).

EXHIBIT 3
THE 1999 HAZARDOUS WASTE REPORT
TOTAL ESTIMATED ANNUAL RESPONDENT BURDEN AND COST SUMMARY

Exhibit	Annual Burden	Annual Labor Cost	Annual Capital/ Startup Cost	Annual O&M Cost	Total Annual Cost
Exhibit 1	152,725	\$6,394,628	\$11,573	\$9,367	\$6,415,568
Annual Total	152,725	\$6,394,628	\$11,573	\$9,367	\$6,415,568
2-Year Total	305,450	\$12,789,255.70	\$23,145	\$18,734.96	\$12,831,136

EXHIBIT 4
THE 1999 HAZARDOUS WASTE REPORT
TOTAL ESTIMATED ANNUAL AGENCY BURDEN AND COST SUMMARY

Exhibit	Annual Burden	Annual Labor Cost	Annual Capital/ Startup Cost	Annual O&M Cost	Total Annual Cost
Exhibit 2	458,175	\$19,183,884	\$34,718	\$28,102	\$19,246,703
Annual Total	458,175	\$19,183,884	\$34,718	\$28,102	\$19,246,703
2-Year Total	916,350	\$38,367,767.10	\$69,435	\$56,204.88	\$38,493,407

6(f) Reasons For Change In Burden

As shown in Exhibit 3, the overall (two-year) burden estimate for the 1999 Biennial Report is 305,450 hours. This represents a decrease of 152,647 hours from the estimated burden of the 1997 Biennial Report (458,097 hours). This decrease does not represent a program change—there have been no changes to the paperwork requirements associated with the Biennial Report—but instead represents an adjustment in the respondent universe from an estimated 24,530 in 1997 to an estimated 15,430 in 1999 (a decrease of 9,100 respondents).

6(g) Burden Statement

Total public burden for this information collection is estimated to average 19.8 hours per response. The reporting burden is estimated to average 16.76 hours per respondent, and includes time for reviewing instructions, gathering data, completing and reviewing the forms, and submitting the report. The record keeping requirement is estimated to average 3.04 hours per response and includes the time for filing and storing the Biennial Report submission for three years.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Office of Policy Regulatory Information Division, U.S. Environmental Protection Agency (2137), 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA ICR number and OMB control number in any correspondence.

APPENDIX A

1999 Hazardous Waste Report Forms and Instructions

APPENDIX B

***Federal Register* Notice on 1999 Biennial Report Renewal**